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BY FAX: (212) 805-7924

The Honorable Sidney H. Stein
United States District Judge
Southern District of New York
United States Courthouse
500 Pearl Street, Room 1010
New York, NY 10007

Re: Gary Silver v. City of New York, et al.
07-CV-9253 (SHS)(KNF)

Your Honor:

I am an attorney in the office of Michael A. Cardozo, Corporation Counsel of the City of New York, supervising the defense of the above-referenced federal civil rights lawsuit. I respectfully write to request that Assistant Corporation Counsel Maurice Hudson, who is assigned by this office to the defense of this case, be permitted *pro hac vice* to depose plaintiff Gary Silver under the supervision of an admitted attorney from this office.¹ Plaintiff's counsel, Karim H. Kamal, Esq., consents to this request. The reasons for this request are set forth below.

Assistant Corporation Counsel Hudson has been handling the case under my supervision since its inception. Mr. Hudson interviewed defendant Eugene Madison, the arresting officer, and has a thorough understanding of the facts and legal issues associated with the case. Also, I recently observed Mr. Hudson depose a plaintiff with the permission of the Honorable Colleen McMahon.² Thus, I believe that it is in the best interests of the City and defendant Madison for Mr. Hudson to depose the plaintiff under supervision.

Mr. Hudson passed the New York State bar examination given last July. Although Mr. Hudson is not presently admitted to the bar of the U.S. District Court for the Southern District of New York, our office anticipates his admission in the next several weeks. I

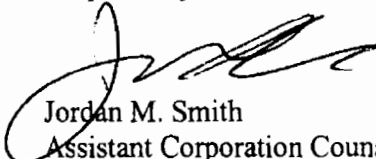
¹ Plaintiff's deposition is presently noticed for March 26, 2008, although we will adjourn to a mutually convenient date if plaintiff is unavailable.

² The deposition was taken by Mr. Hudson on February 12, 2008, in the matter of Kyra Lynch v. City of New York, et al., 07-CIV-10446 (CM)(MHD).

respectfully note for the Court's information that Assistant Corporation Counsels awaiting admission are permitted to practice under supervision in state court by order of the Appellate Division of the Supreme Court, First and Second Departments, under sections 478 and 484 of the Judiciary Law of the State of New York.

Accordingly, for the reasons set forth herein, we respectfully request that the Court to permit Assistant Corporation Counsel Maurice Hudson to take the deposition of plaintiff Gary Silver on a *pro hac vice* basis. Thank you for your consideration of this request.

Respectfully submitted,


Jordan M. Smith
Assistant Corporation Counsel

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